

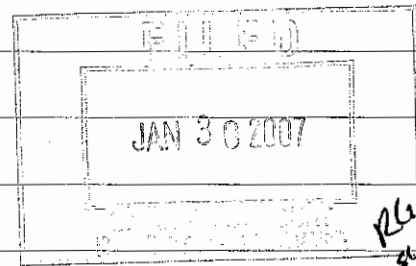
IN THE UNITED STATES District Court
District of Delaware

KEVIN C. BRATHWAITE
PLAINTIFF

V.

C.A. No. 04-1542-G.M.S.

THOMAS CARROLL, et al
DEFENDANTS



Motion For Discovery

Comes Now, The Plaintiff, Kevin C. Brathwaite, to request that this honorable Court order the defendants to turn over the following items for discovery.

1. ANY AND ALL information regarding previous ASSAULTS ON inmates that is in the employment Files of All defendants.
2. All incident reports Filed by the Nine (9) officers that

responded to building #17 Cell-U-8 on October, 9th, 2004 At 9⁰⁰ A.M. When they were responding to the False emergency.

3. The policies AND procedures of protocol when AN inmates cell door is opened in the security housing unit (S-H.U) For the inmate to be taken out of his cell.

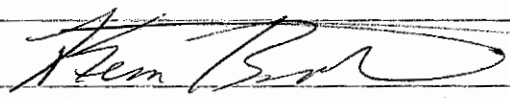
4. Incident reports Filed by ALL officers that worked in building #17 on October, 9th, 2004. on the 8-4 Shift.

5. The policies AND procedures OF protocol when spraying AN inmate with Mace when the inmate is already secured in his cell.

6. A Copy of the Statements given by inmate GERRON LINDSEY on December, 16th, 2004 AND JANUARY, 9th, 2005

7. Copies of the log book entries that shows that this plaintiff WAS strip searched AND his cell thoroughly searched two (2) hours prior to the ASSAULT that took place on December, 15th, 2004.

This Plaintiff prays that this honorable court will order these defendants to supply him with this discovery.

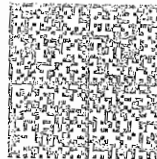
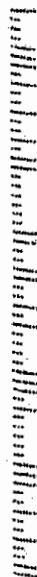

Kevin C. Brathwaite
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Dated: JANUARY, 24th, 2007

IM Kevin C. Beathwaite
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